

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

**IN THE MATTER OF THE SEARCH
OF**

**THE PERSON OF TOMEKA GLENN, AS
IDENTIFIED IN ATTACHMENT A-1, AND
THE PERSON OF KEVIN DAVIS, AS
IDENTIFIED IN ATTACHMENT A-2**

FILED UNDER SEAL

CASE NO. 1:23-mj-01059-JMC

✓ FILED _____ ENTERED
_____ LOGGED _____ RECEIVED

3:22 pm, Apr 06 2023

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY _____ Deputy

AFFIDAVIT IN SUPPORT OF SEARCH WARRANTS

I, Special Agent Benjamin P. Johnson, being duly sworn, depose and state that:

PURPOSE OF THE AFFIDAVIT

1. This affidavit is made in support of an application for warrants pursuant to Fed. R. Crim. 41 to search the persons of Tomeka Glenn (“**GLENN**”), born in March 1976, and further described in Attachment A-1, and Kevin Davis (“**DAVIS**”), born in May 1980, and further described in Attachment A-2, to obtain samples of DNA for comparison purposes in the form of saliva in connection with an investigation of the offense of Possession of a Firearm By a Prohibited Person, in violation of 18 U.S.C. § 922(g)(1) (the “**TARGET OFFENSE**”).

AFFIANT BACKGROUND

2. I have been a Special Agent of the FBI since December 2021. I am currently assigned to the FBI’s Baltimore Field Office where I conduct white-collar crime investigations in Maryland. I have duties that include investigations of, among other matters, wire fraud, fraud against the government, money laundering, public corruption, and civil rights. I have assisted and participated in the preparation and execution of search and arrest warrants.

3. The information contained in this affidavit comes from my personal observations, my training and experience, and information obtained from other investigators, witnesses, and reports. Since this affidavit is being submitted for the limited purpose of establishing probable

cause for securing the search warrants, I have not included every fact known to me concerning the investigation.

4. Rather, I have set forth only those facts that I believe are necessary to establish probable cause to believe that evidence, fruits, and instrumentalities of the **TARGET OFFENSE** are located within the persons of **GLENN** and **DAVIS**.

BACKGROUND REGARDING DNA

5. I know from experience and training that DNA is found in human tissue and provides a genetic “blueprint” for each person. DNA is unique to each person, and it has been used by forensic scientists in a manner similar to fingerprints, that is, to identify persons who have left their DNA behind at crime scenes or on items of evidence. DNA evidence is potentially extremely accurate as a means of identifying individuals. DNA can be found in any number of bodily tissues, including blood, hair, bone, and saliva.

6. A DNA sample suitable for comparison may be obtained by swabbing the inside of a person’s mouth, commonly known as a “buccal swab.” Buccal samples are obtained by asking the subject to open their mouth, whereupon a law enforcement officers (or the subject upon request of the law enforcement officer) inserts a sterile, elongated “Q-tip” into the subject’s mouth, which is then rubbed vigorously along the inside of the subject’s cheeks and elsewhere inside the mouth. The FBI is requesting four (4) such samples be taken from each of **GLENN** and **DAVIS**.

PROBABLE CAUSE

DISCOVERY AND SEIZURE OF FIREARMS

7. On December 16, 2022, Criminal Complaints and Arrest Warrants were authorized by the Honorable Matthew J. Maddox, United States Magistrate Judge for the District

of Maryland, for **GLENN** and **DAVIS** in connection with the charge of Wire Fraud Conspiracy, in violation of 18 U.S.C. § 1349.

8. On December 28, 2022, search warrants were authorized by the Honorable J. Mark Coulson, United States Magistrate Judge for the District of Maryland, for the persons of **GLENN** and **DAVIS**, as well as **GLENN** and **DAVIS**'s residence located at 2809 Claybrooke Drive, Baltimore, Maryland 21244 to search for evidence, fruits, and instrumentalities of Wire Fraud, in violation of 18 U.S.C. § 1343, and Wire Fraud Conspiracy, in violation of 18 U.S.C. § 1349.

9. On January 6, 2023, law enforcement arrested **GLENN** and **DAVIS** who were present at 2809 Claybrooke Drive, Baltimore, Maryland 21244 at the time of the arrest. They were the only people in the house at the time of the arrest. Law enforcement likewise executed search warrants for the residence, as well as the persons of **GLENN** and **DAVIS**, seizing, among other things, various electronic devices, financial documents, a large amount of foreign currency and various high value jewelry.

10. Shortly before entering the residence, law enforcement observed a figure near one of the windows near the main bedroom of the house. During the search of the residence, law enforcement would go on to locate four handguns in the air ducts of the residence, two in the main bedroom air duct (in the general vicinity of where the figure was earlier observed) and two in the air duct of the bathroom closest to the main bedroom.

11. Each of the four firearms had an inserted magazine filled with ammunition. Two of the weapons were each hidden in a gray color sock, inside of the ducts. Based on my training and experience, criminals often conceal firearms, or other evidence, fruits, or instrumentalities of criminal activity, in places not easily visible or accessible to law enforcement, to avoid discovery

of illegal activity.

12. Before the execution of the search warrant at 2809 Claybrooke Drive, law enforcement was aware of **GLENN** and **DAVIS**'s criminal history (discussed further below) and the fact that each was prohibited from lawfully possessing firearms and ammunition. Accordingly, law enforcement seized the four firearms and ammunition, and they are currently in the custody of the FBI and awaiting forensic analysis, including DNA analysis.

13. Based on my knowledge, training, and experience, I know that the handling of firearms can result in the direct transfer of DNA from the person handling the firearms to the firearms.

CRIMINAL HISTORY

14. **GLENN** has multiple past federal and state convictions for offenses punishable by more than one year imprisonment. For example, she was convicted of felonious credit card fraud in Fairfax County, Virginia on March 11, 2016. Further, on or about February 14, 2019, she was also convicted of "Misdemeanor 1" Access Device Fraud in York County, Pennsylvania.

15. **DAVIS** also has a past federal criminal conviction. On or about May 6, 2013, **DAVIS** pleaded guilty in the United States District Court for the District of Arizona to a charge of Conspiracy to Distribute Marijuana, in violation of 21 U.S.C. § 846 and 841(a)(1). On July 24, 2013, the Arizona Court sentence Davis to 63 months incarceration, followed by four years of Supervised Release.

CONCLUSION

16. Based on the foregoing, I respectfully submit that there is probable cause to believe that evidence, fruits, and instrumentalities of the **TARGET OFFENSE** are located within the persons of **GLENN** and **DAVIS**.

17. Accordingly, I respectfully request that the Court issue the proposed search warrants pursuant to Federal Rule of Criminal Procedure 41 to search the persons listed in Attachment A-1 and A-2 and seize the items listed in Attachment B-1 and B-2 to obtain DNA samples from **GLENN** and **DAVIS**, so that the DNA samples may be compared to evidence collected during the course of this investigation, including the four firearms seized from **GLENN** and **DAVIS's** residence located at 2809 Claybrooke Drive.

Respectfully submitted,



Benjamin P. Johnson
Special Agent
Federal Bureau of Investigation

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) this 24 of March 2023.



THE HONORABLE J. MARK COULSON
UNITED STATES MAGISTRATE JUDGE



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ATTACHMENT A-1

DESCRIPTION OF PERSON TO BE SEARCHED

Tomeka Glenn (“**GLENN**”) is described as a Black/African American female with dark hair. According to records provided by the Maryland Motor Vehicle Administration. **GLENN**, date of birth: March 27, 1976, is approximately 5’3” tall and weighs approximately 130 pounds.

Attached below is **GLENN**’s driver’s license photograph.



ATTACHMENT A-2

DESCRIPTION OF PERSON TO BE SEARCHED

Kevin Davis (“**DAVIS**”) is described as a Black/African American male with dark hair. According to records provided by the Maryland Motor Vehicle Administration, **DAVIS**, date of birth: Marcy 27, 1976, is approximately 5’9” tall and weighs approximately 167 pounds.

Attached below is **DAVIS’s** driver’s license photograph.



ATTACHMENT B-1

ITEMS TO BE SEIZED

This warrant authorizes the obtaining of DNA evidence by means of four oral buccal DNA swabs to be obtained from Tomeka GLENN (described in Attachment A-1).

ATTACHMENT B-2

ITEMS TO BE SEIZED

This warrant authorizes the obtaining of DNA evidence by means of four oral buccal DNA swabs to be obtained from Kevin DAVIS (described in Attachment A-2).